

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

AMY CORRICK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. CIV-21-307-J
	)	
8409 NE 10 <sup>TH</sup> LLC d/b/a HAYDEN PLACE	)	
APARTMENTS,	)	
	)	
Defendant.	)	

**COMPLAINT**

**COMES NOW** the Plaintiff, Amy Corrick (hereinafter referred to as “Corrick” or “Plaintiff”), and for her cause of action against the Defendant, 8409 NE 10<sup>th</sup> LLC d/b/a Hayden Place Apartments (hereinafter referred to as “Defendant”), asserts and states as follows:

1. The Plaintiff resides within the City of Broomfield, County of Broomfield, State of Colorado.
2. That the Defendant, 8409 NE 10<sup>th</sup> LLC, conducts business within the City of Oklahoma City, County of Oklahoma, State of Oklahoma.
3. Specifically, Defendant is the owner and operator of an apartment complex doing business as Hayden Place Apartments.
4. The claims alleged herein occurred in Oklahoma County, State of Oklahoma.
5. The court has jurisdiction over this matter pursuant to 28 U.S.C. §1332 because there is diversity between the parties and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.
6. Therefore, jurisdiction and venue are proper herein.

7. That on February 13, 2020, Plaintiff was an invitee on the premises of the Defendant's property located at 6305/6307 N.W. 10<sup>th</sup> Street, Oklahoma City, Oklahoma when she fell down a flight of stairs.
8. That the Defendant was negligent by, including but not limited to, failing to properly maintain the premises in a safe condition for its invitees, such as Plaintiff, and by failing to place warning signs or taking necessary precautions to ensure that the premises were in fact safe for its customers and by failing to provide adequate training of its employees to ensure the premises are safe for its customers.
9. That as a result of the negligence of the Defendant, the Plaintiff sustained permanent injuries and has incurred medical bills and will in the future incur medical bills; she has experienced pain and suffering and, in the future, will experience pain, suffering and permanent disability.

**WHEREFORE**, Plaintiff, Amy Corrick, seeks recovery and judgment from the Defendant for an amount in excess of SEVENTY-FIVE THOUSAND AND NO/100 DOLLARS (\$75,000.00) including costs, interest and such other and further relief as the Court deems appropriate.

Respectfully submitted,

s/ Kenyatta R. Bethea

Kenyatta R. Bethea, OBA# 18650

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**ATTORNEYS FOR PLAINTIFF**

**AMY CORRICK**

**ATTORNEY LIEN CLAIMED!**

**JURY TRIAL DEMAND!**